

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

JOANN INC., *et al.*,

Debtors.

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)  
) Chapter 11  
)

) Case No. 25-10068 (CTG)  
) Jointly Administered  
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) **Hearing Date: To Be Determined**  
) **Objection Deadline: May 9, 2025 at 4:00 p.m.**  
) **(ET)**  
)

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that on April 25, 2025, the Feldman Companies, Inc. (“Movant”) filed the *Motion for Allowance and Payment of Administrative Claim Pursuant to Section 503(B) of the Bankruptcy Code or, Alternatively, to Compel Performance Under Postpetition Contract* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware.

**PLEASE TAKE FURTHER NOTICE** that any objections to the Motion must be filed on or before **May 9, 2025, at 4:00 p.m. (ET)** (the “Objection Deadline”) with the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 Market Street, Wilmington, Delaware 19801. At the same time, you must serve a copy of any objection upon Movant’s undersigned counsel so as to be received on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE** that a hearing on the Motion will be held on a **date to be determined** before the Honorable Craig C. Goldblatt, in the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, courtroom 7, Wilmington, Delaware 19801, if an objection is filed.

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN  
ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF  
REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OF A HEARING.**

Dated: April 25, 2025  
Wilmington, Delaware

/s/ Michael J. Joyce  
Michael J. Joyce (No. 4563)  
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*Counsel to the Feldman Companies, Inc.*